

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LAMBDA OPTICAL SOLUTIONS, LLC,)	
)	
Plaintiff,)	
)	
v.)	
)	
ALCATEL-LUCENT SA, et al.,)	
)	
Defendants.)	C.A. No. 10-487-RGA-CJB
)	
_____)	
)	
ALCATEL-LUCENT USA INC. and)	
ALCATEL-LUCENT HOLDINGS INC.,)	
)	
Counterclaimants,)	
)	
v.)	
)	
LAMBDA OPTICAL SOLUTIONS LLC,)	
LAMBDA OPTICAL SYSTEMS CORP., and)	
ANASTASIOS TZATHAS,)	
)	
Counter-Defendants.)	

STIPULATION AND PROPOSED ORDER

Plaintiff Lambda Optical Solutions, LLC (“Lambda”) and Defendants Alcatel-Lucent USA Inc. and Alcatel-Lucent Holdings Inc. (collectively, “Alcatel-Lucent”) hereby stipulate and agree, subject to the approval of the Court, that in light of this Court’s Report and Recommendation (D.I. 326), the fact discovery deadline as to these parties is hereby extended until July 15, 2013 for the limited purpose of completing already-noticed discovery and additional discovery regarding the configurations of the Alcatel-Lucent 1695 Wavelength Services Manager that were sold from January 1, 2007, to present.

Lambda and Alcatel-Lucent further hereby stipulate and agree, subject to the approval of the Court, that the below deadlines as to these parties¹ are amended as follows:

¹ Anastasios Tzathas did not agree to an extension of deadlines for expert report and case dispositive deadlines addressing claims by Alcatel-Lucent against Mr. Tzathas. Accordingly, absent a separate order of the Court that avoids double-tracking deadlines for expert reports

<u>EVENT</u>	<u>AMENDED DEADLINE</u>
Opening Expert Reports	July 30, 2013
Rebuttal Expert Reports	August 30, 2013
Reply Expert Reports	September 17, 2013
End of Expert Discovery	October 22, 2013
Case Dispositive Motions	November 26, 2013
Answering Briefs to Case Dispositive Motions	December 17, 2013
Reply Briefs to Case Dispositive Motions	January 8, 2014
Pretrial Conference	April 10, 2014
Trial	April 28, 2014

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and case dispositive motions, the deadlines pertaining to Mr. Tzathas will not be affected by this stipulation and will remain as set forth in the scheduling order as previously amended by D.I. 323.

SO ORDERED this ____ day of _____, 2013.

United States Magistrate Judge